



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 26 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article No: 7001-0320-0002-5344-2731

Yefin Ziskind, Owner and Operator
Admiral Wilson Amoco
1901 Admiral Wilson Blvd.
Camden, NJ 08109

Re: Field Citation No. II-UST-FC-478

Dear Mr. Ziskind:

The U.S. Environmental Protection Agency (EPA) Region 2 is in receipt of your signed field citation referenced above. By signing this document, you have agreed to the Compliance Order/Settlement Agreement and have certified that the violation has been corrected. We have also received a copy of the penalty payment in the amount of \$500 for the noted violation.

Enclosed you will find a copy of the field citation with the Compliance Order/Settlement Agreement signed as accepted and approved by EPA. EPA will take no further civil action against you for the violation listed in the Field Citation provided that the listed violation has been corrected. EPA has approved the settlement agreement based on your signed certification and supporting compliance documentation.

EPA may choose to re-inspect your facility; if you cannot make available records demonstrating compliance for review during the re-inspection, such failure will be your second violation of federal Underground Storage Tank (UST) regulations. A second offense may result in a civil action with penalties of up to \$11,000 per UST system per day of violation. In addition, you must rectify any violations that the New Jersey Department of Environmental Protection (DEP) indicated on their Notice of Violation. Also, as indicated in paragraph 2 of the settlement agreement, making a false submission to the U.S. Government is a criminal offense.

Thank you for your cooperation. If you have any question regarding this letter or other related matter, please call Claudia Gutierrez of my staff at (212) 637-4945 or via email at gutierrez.claudia@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "David Bernstein".

David Bernstein, Acting Section Chief
Ground Water Compliance Section

Enclosure

bcc:

Claudia Gutierrez, 2DECA-WCB
John Ciorciari, 2OPM-FMB

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION II

290 Broadway, New York, NY 10007-1866

NOTICE OF VIOLATION AND
COMPLIANCE ORDER/SETTLEMENT AGREEMENT

PART I
NOTICE OF VIOLATION

On this 4 day of October, 2002
at 12:10 a.m./p.m.

at the Facility:

located at: 1901 Admiral Wilson Blvd, Camden NJ

State permit/license/identification number: 001608
in the presence of the Owner/Operator/On-Site Representative:

YEFIM ZISKIND
Title: Owner/Operator

an authorized representative of the United States Environmental Protection Agency (EPA) inspected this facility to determine compliance with underground storage tank regulations promulgated under Subtitle I of the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. § 6912 et seq.). During this inspection, the following violations of the underground storage tank regulations were found:

40 CFR 280. 34(b)(2) Penalty: \$ 50.00

Violation: Failure to maintain CP equipment
operator documentation

40 CFR 280. 41(b)(4)(i) Penalty: \$ 300.00

Violation: Failure to have annual Line Tightness
test

40 CFR 280. 44 Penalty: \$ 150.00

Violation: Failure to have Line Leak detector
test (annual)

40 CFR 280. _____ Penalty: \$ _____

Violation: _____

40 CFR 280. _____ Penalty: \$ _____

Violation: _____

Proposed Penalty Total: \$ 500.00

I have personally observed the above violations of the underground storage tank regulations.

[Signature] Date: 10/4/02
(Signature of EPA Inspector)

Receipt: I hereby acknowledge receipt of this Notice of Violation and the accompanying Compliance Order/Settlement Agreement and Instructions.

Yefim Ziskind Date: 10/4/02
(Signature of Owner, Operator or On-site Representative)

Yefim Ziskind
(Print Name)

FIELD CITATION No: II-UST-FC-

478

PART II
COMPLIANCE ORDER/SETTLEMENT AGREEMENT

This Compliance Order/Settlement Agreement is not effective until signed below by the owner or operator and approval by EPA is acknowledged through EPA's signature below. By signing the Settlement Agreement included herein, the owner or operator agrees not to challenge the issuance of the Compliance Order included herein and accepts the terms of the Settlement Agreement. The owner or operator shall sign the Settlement Agreement first, and return it to EPA as provided in the instructions provided with this Compliance Order/Settlement Agreement. Subsequent signature by EPA constitutes issuance of the Compliance Order and approval on EPA's part of the Settlement Agreement. Approval and signature by EPA is in the sole discretion of the Regional Administrator, Region II, or authorized delegate. EPA reserves the right to withdraw this offer of settlement at any time prior to signature by EPA.

Compliance Order:

Under the authority of Subtitle I of the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. §6912 et seq.), EPA FINDS that the owner or operator signing below is in violation of the underground storage tank regulations as described in the foregoing Notice of Violation, and Orders the owner or operator signing below to correct the violations and pay a civil penalty or penalties in the full amount described in the Notice of Violation (Part I).

Settlement Agreement:

In order to expeditiously settle violations described in the Notice of Violation found herein, EPA AND THE OWNER OR OPERATOR SIGNING BELOW ENTER INTO THE FOLLOWING SETTLEMENT AGREEMENT:

1. This Settlement Agreement is binding on the EPA and the Facility whose Owner or Operator signs below.
2. The Owner or Operator signing below certifies, under threat of civil and criminal penalties for making a false submission to the United States Government, that the Owner or Operator has corrected the violations described in the Notice of Violation. The owner or operator has presented EPA with this Settlement Agreement, a certified check to pay the full amount of penalties in accordance with the instructions included with this Notice of Violation and Compliance Order/Settlement Agreement. FAILURE TO RETURN THE SIGNED SETTLEMENT AGREEMENT AND CERTIFIED CHECK WITHIN 30 DAYS OF ISSUANCE OF THE NOTICE OF VIOLATION WILL RESULT IN AUTOMATIC WITHDRAWAL OF THIS SETTLEMENT OFFER.
3. The Owner or Operator signing below waives any objections to EPA's jurisdiction with respect to this Compliance Order/Settlement Agreement, the violations, penalty amount, and consents to EPA's approval of this Settlement Agreement without further notice.
4. The Owner or Operator signing below waives the opportunity for a public hearing pursuant to Section 9006 of the Resource Conservation and Recovery Act.
5. Upon EPA approval of this Settlement Agreement, EPA will take no further civil action against the Owner or Operator for the specific violations listed in this Notice of Violation provided the listed violations have been corrected.
6. EPA does not waive the authority of EPA or the designated state or local implementing agency to take enforcement action for any past, present or future violations of the underground storage tank requirements not described in Part I Notice of Violation. Further, EPA does not waive its authority to enforce for violations under any other statute.
7. This Settlement Agreement is effective upon EPA's approval entered below. Upon EPA approval, EPA shall mail a copy of the approved Settlement Agreement to the Owner or Operator signing below at the address provided.
8. Approval of this Settlement Agreement is in the sole discretion of the EPA Regional Administrator, Region II, or authorized delegate.

SIGNATURE BY OWNER OR OPERATOR:

Name: Y. Ziskind Title: president
Y. Ziskind Date: 10-22-02
(Signature)

Facility Name and Address: 1901 Admiral Wilson Blvd
Camden NJ 08109 Amoco

ACCEPTANCE AND APPROVAL BY EPA:

Name: Daniel Benavente Title: Chief
[Signature] Date: 2/24/03
(Signature)

INSTRUCTIONS

The United States Environmental Protection Agency (EPA) has authority under Section 9006 of the Resource Conservation and Recovery Act to issue Compliance Orders and to pursue civil penalties for violations of the underground storage tank regulations. The statute authorizes penalties of up to \$10,000 for each tank for each day of violation.

The EPA, however, encourages the expedited settlement of easily verifiable violations of the underground storage tank regulations, such as the violations described in the Notice of Violation, Part I, by agreeing to standard settlement terms that include expedited correction of the violation and payment of appropriate penalties.

The Owner or Operator may resolve the cited violations quickly by correcting the violations, paying the penalty amount and signing and returning the Settlement Agreement within 30 days of the issuance of the Notice of Violation. If requested, EPA will grant one 30 day extension for the period to come into compliance where the owner or operator satisfactorily demonstrates that it is technically infeasible or impracticable to achieve compliance within 30 days. If a 30 day extension is requested, the owner or operator must submit the compliance report and schedule within 30 days of issuance of the citation, and the signed settlement agreement and payment within the 30 day extension period (for a total permissible compliance period of 60 days).

Failure to sign and return the compliance order/settlement agreement within the 30 days originally allowed, or the 60 days allowed if an extension is requested, will result in automatic termination of this offer of settlement.

The payment of the penalty amount must be in the form of a certified check payable to the "U.S. Environmental Protection Agency - Region 2", with the field citation number (listed at the top right of the reverse side) written on the check.

1. Send the check in payment of the penalty amount and the yellow copy of this Field Citation/Settlement Agreement signed by you, the owner or operator (or authorized representative) to:

EPA - Region 2
(Regional Hearing Clerk)
P.O. Box 360188M
Pittsburgh, Pa. 15251

2. Send this original Field Citation/Settlement Agreement and a copy of the check and any required material documenting compliance to:

Chief,
Ground Water Compliance Section
Division of Enforcement and Compliance Assistance
U.S. EPA, Region 2
290 Broadway
New York, NY 10007-1866

EPA will not approve the Settlement Agreement if there is any alteration of the Notice of Violation and Compliance Order/Settlement Agreement or payment of less than the full amount of penalties, or if the Settlement Agreement is not returned in the time allowed. EPA will treat any response to the Notice of Violation other than timely acceptance of the Settlement Agreement as an indication that you are not interested in pursuing this expedited settlement procedure.

If the Settlement Agreement is not returned in the proper form and/or if full payment of the penalties is not made in the time allowed, or if the Settlement Agreement does not receive approval by EPA, EPA may proceed to file enforcement actions and seek civil penalties as authorized by statute for the above violations. Failure to return the Settlement Agreement and pay the penalty amounts within the time allowed does not relieve the owner and operator of the responsibility to comply fully with the regulations, including correcting the violations that have been specifically identified by the inspector.

This Notice of Violation and Compliance Order/Settlement Agreement is not an adjudicatory proceeding under 40 CFR Part 22, the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits. However, if EPA pursues administrative enforcement measures in order to correct the violations or to seek penalties, you will receive instructions describing your rights under those rules. By signing this Compliance Order/Settlement Agreement, the owner or operator waives the right to a public hearing pursuant to Section 9006 of the Resource Conservation and Recovery Act.

Approval of Settlement Agreement is in the sole discretion of the Regional Administrator, Region 2, EPA, or authorized delegate. Upon EPA approval, a copy of the approved Settlement Agreement will be returned to you, and EPA will take no further civil action against the party cited herein for the violations listed in the Notice of Violation provided the listed violations have been corrected.

If you have any questions, or if you disagree with any of the findings set forth in Part I, Notice of Violation, you may contact the EPA Region 2 Ground Water Compliance Section at (212) 637-3766. Be aware, however, that nothing said over the telephone may alter the terms set out in this document.

OFFICIAL CHECK

NOTICE TO CUSTOMERS

THE PURCHASE OF AN INDEMNITY BOND WILL BE REQUIRED
BEFORE THIS CHECK WILL BE REPLACED OR REFUNDED IN THE
EVENT IT IS LOST, MISPLACED, STOLEN OR DESTROYED

Commerce Bank

6 GROVE STREET
CHERRY HILL, NJ 08002

002-36886

55-198312

002-

PAY
TO THE ORDER OF

U S ENVIRONMENTAL PROTECTION AGENCY REGION 2

OCT 22, 2002

\$500.00**

DOLLARS

PAID BY **SECURITY**

RE: 11-457-FC-478

"00236886" :0312013601 90 0110 5"

Robert F. Smith
General Manager



October 16, 2002

RE: Amoco 30469/5179
1901 Admiral Wilson Blvd.
Camden, NJ 08100

The five UST's and associated piping at the above location were tested for Cathodic Protection on 3/27/01. The results of the test found that the tanks did not meet the criterion for Cathodic Protection as established by NACE. However, the sections of steel piping at the dispensers did meet the criterion. All five tanks at this site are internally lined and do not require Cathodic Protection. This site currently meets Federal and Local regulations regarding Cathodic Protection.

Currently Tanknology is working with BP to install an Impressed Current Cathodic Protection system for the tanks and piping. The system that has been designed includes nine anodes connected to junction box and a constant current rectifier. NJDEP will be contacted regarding the necessity for a Substantial Modification Permit. Once the need for a permit has been established, Tanknology and BP will take the appropriate actions to complete this installation.

If you need any other assistance, please do not hesitate to call me at (800) 666-1215.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Stevenson".

Jeff Stevenson
Operations Manager
Mid-Atlantic Region

CERTIFICATE OF UNDERGROUND STORAGE TANK SYSTEM TESTING



8900 SHOAL CREEK, BUILDING 200
AUSTIN, TEXAS 78757
(512) 451-6334
FAX (512) 459-1459

TEST RESULT SITE SUMMARY REPORT

TEST TYPE: TLD-1

PURPOSE: COMPLIANCE

TEST DATE: 10/12/02

CUSTOMER PO:

WORK ORDER NUMBER: 8230420

CLIENT: ADMIRAL WILSON AMOCO
1901 ADMIRAL WILSON BLVD.
CAMDEN, NJ 08109

SITE: ADMIRAL WILSON AMOCO
1901 ADMIRAL WILSON BLVD
CAMDEN, NJ 08109

PHIL ZISKIND
(856) 541-0556

PHIL
(856) 541-0556

The following test(s) were conducted at the site above in accordance with all applicable portions of Federal, NFPA and local regulations

Line and Leak Detector Tests

TANK NUMBER	PRODUCT	VOLUME CHANGE (gph)				LINE RESULT (P=pass, F=fail I=inconclusive)				LEAK DETECTOR PRESENT		LEAK DETECTOR RESULT		IMPACT VALVES OPERA- TIONAL
		A	B	C	D	A	B	C	D	#1	#2	#1	#2	
SECONDAR 1	GOLD													
PRIMARY 2	GOLD	0.006				P				Y		P		Y
	3 SILVER	0.006				P				Y		P		Y
PRIMARY 4	REGULAR	0.014				P				Y		P		Y
SECONDAR 5	REGULAR													

Tanknology appreciates the opportunity to serve you, and looks forward to working with you in the future. Please call any time, day or night, when you need us.

Tanknology representative:
MICHAEL PEPE

Test conducted by:
JAMES EDWARD REEVES

Reviewed:

Technician Certification Number: NJ 12873

INDIVIDUAL TANK INFORMATION AND TEST RESULTS



TEST DATE: 10/12/02
CLIENT: ADMIRAL WILSON AMOCO

8900 SHOAL CREEK, BUILDING 200
AUSTIN, TEXAS 78757 (512) 451-6334

WORK ORDER NUMBER 8230420
SITE: ADMIRAL WILSON AMOCO

TANK INFORMATION

Tank ID: PRIMARY 2	Tank manifolded: YES	Bottom to top fill in inches:
Product: GOLD	Vent manifolded: NO	Bottom to grade in inches:
Capacity in gallons: 8,000	Vapor recovery manifolded: NO	Fill pipe length in inches:
Diameter in inches: 96.00	Overfill protection: YES	Fill pipe diameter in inches: 4.0
Length in inches: 258	Overspill protection: YES	Stage I vapor recovery: COAX
Material: STEEL	Installed: ATG	Stage II vapor recovery: BALANCE
CP installed on: / /		

COMMENTS

TANK TEST RESULTS Test Method: VacuTest

	Start (in)	End (in)
Dipped Water Level:		
Dipped Product Level:		
Probe Water Level:		
Ingress Detected:	Water	Bubble Ullage
Test time:		
Inclinometer reading:		
VacuTest Test Type:	NOT	
VacuTest Probe Entry Point:	TESTED	
Pressure Set Point:		
Tank water level in inches:		
Water table depth in inches:		
Determined by (method):		
Result:		

COMMENTS

LEAK DETECTOR TEST RESULTS

Test method: LT-1

	New/passed L.D. #1	Failed/replaced L.D. #1	New/passed L.D. #2	Failed/replaced L.D. #2
Make:	RED JACKET			
Model:	FX1V			
S/N:				
Open time in sec:	6.00			
Holding psi:	15			
Resiliency in ml:	407			NOT
Test leak rate ml/m:	189.0			TESTED
Metering psi:	10			
Calib. leak in gph:	3.00			
Results:	PASS			

COMMENTS

LINE TEST RESULTS

Test type: TLD-1

	LINE A	B	C	D
Material:	DW FIBERG			
Diameter (in):	2.0			
Length (ft):	300.0			
Test psi:	50			
Bleedback cc:	0			
Test time (min):	60			
Start time:	10:10	NOT TESTED	NOT TESTED	NOT TESTED
End time:	10:40			
Final gph:	0.006			
Result:	PASS			
Pump type:	PRESSURE			
Pump make:	RED JACKET			

COMMENTS

Impact Valves Operational: YES

INDIVIDUAL TANK INFORMATION AND TEST RESULTS



TEST DATE: 10/12/02
CLIENT: ADMIRAL WILSON AMOCO

8900 SHOAL CREEK, BUILDING 200
AUSTIN, TEXAS 78757 (512) 451-6334

WORK ORDER NUMBER: 8230420
SITE: ADMIRAL WILSON AMOCO

TANK INFORMATION

Tank ID: 3	Tank manifolded: NO	Bottom to top fill in inches:
Product: SILVER	Vent manifolded: NO	Bottom to grade in inches:
Capacity in gallons: 8,000	Vapor recovery manifolded: NO	Fill pipe length in inches:
Diameter in inches: 96.00	Overfill protection: YES	Fill pipe diameter in inches: 4.0
Length in inches: 258	Overspill protection: YES	Stage I vapor recovery: COAX
Material: STEEL	Installed: ATG	Stage II vapor recovery: BALANCE
	CP installed on: / /	

COMMENTS

TANK TEST RESULTS Test Method: VacuTest

	Start (in)	End (in)
Dipped Water Level:		
Dipped Product Level:		
Probe Water Level:		
Ingress Detected:	Water	Bubble
Test time:		Ullage
Inclinometer reading:		
VacuTest Test Type:	NOT	
VacuTest Probe Entry Point:	TESTED	
Pressure Set Point:		
Tank water level in inches:		
Water table depth in inches:		
Determined by (method):		
Result:		

COMMENTS

LEAK DETECTOR TEST RESULTS

Test method: LT-1

	New/passed L.D. #1	Failed/replaced L.D. #1	New/passed L.D. #2	Failed/replaced L.D. #2
Make:	RED JACKET			
Model:	FX1V			
S/N:				
Open time in sec:	5.00			
Holding psi:	17			
Resiliency in ml:	294			NOT
Test leak rate ml/m:	189.0			TESTED
Metering psi:	10			
Calib. leak in gph:	3.00			
Results:	PASS			

COMMENTS

LINE TEST RESULTS

Test type: TLD-1

LINE	A	B	C	D
Material:	DW FIBERG			
Diameter (in):	2.0			
Length (ft):	300.0			
Test psi:	50			
Bleedback co:	0			
Test time (min):	30	NOT	NOT	NOT
Start time:	09:35	TESTED	TESTED	TESTED
End time:	10:05			
Final gph:	0.006			
Result:	PASS			
Pump type:	PRESSURE			
Pump make:	RED JACKET			

COMMENTS

Impact Valves Operational: YES

INDIVIDUAL TANK INFORMATION AND TEST RESULTS



TEST DATE: 10/12/02
CLIENT: ADMIRAL WILSON AMOCO

8900 SHOAL CREEK, BUILDING 200
AUSTIN, TEXAS 78757 (512) 451-6334

WORK ORDER NUMBER 8230420
SITE: ADMIRAL WILSON AMOCO

TANK INFORMATION

Tank ID: PRIMARY 4	Tank manifolded: YES	Bottom to top fill in inches: 96.0
Product: REGULAR	Vent manifolded: NO	Bottom to grade in inches:
Capacity in gallons: 8,000	Vapor recovery manifolded: NO	Fill pipe length in inches:
Diameter in inches: 96.00	Overfill protection: YES	Fill pipe diameter in inches: 4.0
Length in inches: 258	Overspill protection: YES	Stage I vapor recovery: COAX
Material: STEEL	Installed: ATG	Stage II vapor recovery: BALANCE
CP installed on: / /		

COMMENTS

TANK TEST RESULTS Test Method: VacuTest

	Start (in)	End (in)
Dipped Water Level:		
Dipped Product Level:		
Probe Water Level:		
Ingress Detected: Water	Bubble	Ullage
Test time:		
Inclinometer reading:		
VacuTest Test Type:	NOT	
VacuTest Probe Entry Point:	TESTED	
Pressure Set Point:		
Tank water level in inches:		
Water table depth in inches:		
Determined by (method):		
Result:		

COMMENTS

LEAK DETECTOR TEST RESULTS

Test method: LT-1

	New/passed L.D. #1	Failed/replaced L.D. #1	New/passed L.D. #2	Failed/replaced L.D. #2
Make:	RED JACKET			
Model:	FX1V			
S/N:				
Open time in sec:	6.00			
Holding psi:	10			
Resiliency in ml:	375			NOT
Test leak rate ml/m:	199.0			TESTED
Metering psi:	10			
Calib. leak in gph:	3.00			
Results:	PASS			

COMMENTS

LINE TEST RESULTS

Test type: TLE-1

	LINE A	B	C	D
Material:	DW FIBERG			
Diameter (in):	2.0			
Length (ft):	300.0			
Test psi:	50			
Bleedback cc:	0			
Test time (min):	60			
Start time:	08:30	NOT TESTED	NOT TESTED	NOT TESTED
End time:	09:30			
Final gph:	0.014			
Result:	PASS			
Pump type:	PRESSURE			
Pump make:	RED JACKET			

COMMENTS

Impact Valves Operational: YES